IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

Master File No. 10-CV-00990-SLR

IN RE WILMINGTON TRUST : (Securities Class Action)

SECURITIES LITIGATION

Hon. Sue L. Robinson

This Document Relates to: ALL ACTIONS : ELECTRONICALLY FILED

Oral Argument Requested

SCHEDULING STIPULATION AND PROPOSED ORDER GOVERNING LEAD PLAINTIFFS' MOTION FOR LEAVE TO AMEND AND DEFENDANTS' MOTIONS TO DISMISS THE THIRD AMENDED CONSOLIDATED SECURITIES CLASS ACTION COMPLAINT

WHEREAS, Lead Plaintiffs filed their Second Amended Consolidated Securities Class Action Complaint (the "SAC") on May 10, 2012;

WHEREAS, Lead Plaintiffs filed a Motion to Supplement and Amend the SAC on December 7, 2012 (the "Motion for Leave to Amend");

WHEREAS, the parties have agreed that Lead Plaintiffs may file their proposed Third Amended Consolidated Securities Class Action Complaint (the "TAC") in the same form as attached as Exhibit A to the Motion for Leave to Amend, and Defendants reserve their right to challenge the sufficiency of the TAC; and

WHEREAS, Lead Plaintiffs and Defendants have conferred regarding a briefing schedule for Defendants' motions to dismiss the TAC and have agreed on the schedule set forth below;

IT IS HEREBY STIPULATED, by and between Lead Plaintiffs and Defendants, subject to the approval of the Court, as follows:

1. Lead Plaintiffs shall file the TAC promptly after Court approval of this stipulation.

- 2. Defendants shall file motions to dismiss the TAC and briefs in support thereof on or before February 28, 2013.
- 3. Lead Plaintiffs shall file their answering brief in opposition to Defendants' motions to dismiss the TAC on or before April 25, 2013.
- 4. Defendants shall file their reply briefs in further support of their motions to dismiss the TAC on or before May 30, 2013.

Respectfully submitted,

/s/ A. Zachary Naylor

Pamela S. Tikellis (ID No. 2172)
A. Zachary Naylor (ID No. 4439)
CHIMICLES & TIKELLIS LLP
222 Delaware Ave., 11th Floor
P.O. Box 1035
Wilmington, Delaware 19899-1035
Telephone: (302) 656-2500
Fax: (302) 656-9053
PamelaTikellis@chimicles.com
ZN@chimicles.com

Attorneys for Merced County Employees'
Retirement Association, Coral Springs Police
Pension Fund, St. Petersburg Firefighters'
Retirement System, Pompano Beach General
Employees Retirement System, and Automotive
Industries Pension Trust Fund

/s/ Robert S. Saunders

Thomas J. Allingham II (ID No. 476) Robert S. Saunders (ID No. 3027) SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP One Rodney Square P.O. Box 636 Wilmington, Delaware 19899-0636 Telephone: (302) 651-3000 Fax: (302) 651-3001 Thomas.Allingham@skadden.com Rob.Saunders@skadden.com

Attorneys for Defendants Ted T. Cecala, Donald E. Foley, David R. Gibson, Robert V.A. Harra, Jr., Kevyn N. Rakowski, Carolyn S. Burger, R. Keith Elliott, Gailen Krug, Stacey J. Mobley, Michele M. Rollins, David P. Roselle, Oliver R. Sockwell, Robert W. Tunnell, Jr., Susan D. Whiting, Rex L. Mears, Louis J. Freeh, and Wilmington Trust Corporation

/s/ Laura Davis Jones

Laura Davis Jones (ID No. 2436) Curtis A. Hehn (ID No. 4264)

PACHULSKI STANG ZEIHL & JONES LLP

919 N. Market Street. 17th Floor

P.O. Box 8705

Wilmington, Delaware 19899-8705

Telephone: (302) 652-4100

Fax: (302) 652-4400 ljones@pszjlaw.com chen@pszjlaw.com

J. Douglas Baldridge

George Kostolampros

VENABLE LLP 575 7th Street, NW

Washington, DC 20004

Telephone: (202) 344-4000

Fax: 202-344-8300

jbaldridge@Venable.com

gkostolampros@Venable.com

Attorneys for Defendant Thomas L. DuPont

/s/ Stephen C. Norman

Stephen C. Norman (ID No. 2686)

POTTER ANDERSON & CORROON LLP

1313 North Market Street, 6th Floor

Hercules Plaza

P.O. Box 951 Wilmington, Delaware 19899

Telephone: (302) 984-6000

Fax: (302) 658-1192

snorman@potteranderson.com

Thomas C. Rice

David F.E. Tejtel

SIMPSON THACHER & BARTLETT LLP

425 Lexington Avenue

New York, New York 10017

Telephone: (212) 455-2000

Fax: (212) 455-2502

dtejtel@stblaw.com

trice@stblaw.com

Attorneys for Defendants J.P. Morgan

Securities LLC and Keefe, Bruyette & Woods,

Inc.

/s/ Virginia A. Gibson

Virginia A. Gibson (ID No. 3699) HOGAN LOVELLS US LLP 1835 Market Street, 29th Floor Philadelphia, PA 19103 Telephone: (267) 675-4635

Fax: (267) 675-4601

Virginia.gibson@hoganlovells.com

Attorneys for Defendant KPMG LLP

/s/ David E. Wilks

David E. Wilks (ID No. 2793) Andrea S. Brooks (ID No. 5064)

WILKS, LUKOFF & BRACEGIRDLE, LLC

1300 N. Grant Avenue, Suite 100 Wilmington, Delaware 19806

Telephone: (302) 225-0850

Fax: (302) 255-0859 dwilks@wlblaw.com

abrooks@wlblaw.com

Attorneys for Defendant William B. North

DATED: January 7, 2013

SO ORDERED this day of January, 2013.

Judge Sue L. Robinson